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VIA ECF

Hon. Peggy Kuo, United States Magistrate Judge
United States District Court for the Eastern District of New York
Theodore Roosevelt United States Courthouse

Re: *Turbi-Garcia v. Electchester Management LLC et al*, 15 CV 4924 (KAM) (PK)

Dear Judge Kuo:

This firm represents the plaintiffs in the above-referenced action. The plaintiffs, with defendants' consent, move to extend the deadline to complete discovery from today until August 14, 2020. The parties need to complete depositions of defendants and employees of defendants, these depositions were noticed, but could not be held due to Covid-19, and the parties have been working to reschedule them.

Before the depositions can occur, the parties are working to stipulate to certain facts. This case involves porters who worked in residential buildings and whether or not they are entitled to wages for "on-call" time. The parties believe they can stipulate to hourly rates, when on-call shifts happened for each class member, and the lengths of employment for each class member. If the parties can stipulate to these facts, it will vastly streamline depositions, trial, and what additional documents, if any, must be provided. The plaintiffs have sent the defendants a detailed spreadsheet outlining which facts are still in dispute, after already previously conferring in detail over these facts. The parties are making progress, and should be figuring out what disputes, if any, exist, shortly. Once the parties know where they disagree on these facts, the parties can agree regarding what additional documents should be provided, and then depositions can go forward.

I thank the Court for its time and consideration and apologize for the lateness of this request.

Respectfully submitted,



John M. Gurrieri